

1 3. This Notice is being filed with this Court within thirty (30) days after
2 Equifax Inc. was served with a copy of Plaintiffs' initial pleading setting forth the
3 grounds for their action and their claims for relief.

4 4. This Court has original jurisdiction over this case pursuant to 28
5 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or
6 treaties of the United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known
7 as the Fair Credit Reporting Act ("FCRA"), as follows:

8 (a) Plaintiff's Complaint, on its face, alleges a violation of the FCRA.
9 (See Plaintiff's Complaint).

10 (b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action
11 alleging a violation of its provisions "may be brought in any appropriate United
12 States district court without regard to the amount in controversy . . ."

13 5. Promptly after the filing of this Notice of Removal, Equifax Inc. shall
14 give written notice of the removal to Plaintiff and to the Contra Costa County
15 Superior Court, California, as required by 28 U.S.C. § 1446(d).

16 6. Attached hereto, as Exhibit A, are copies of the Summons and
17 Complaint served upon Equifax Inc. in the State Court Action.

18 WHEREFORE, Equifax Inc. requests that the above-described action be
19 removed to this Court.

20
21 Dated: September 15, 2017

NOKES & QUINN

22 /s/ Thomas P. Quinn, Jr.
23 THOMAS P. QUINN, JR.
24 Attorneys for Defendant
25 EQUIFAX INC.
26
27
28

CERTIFICATE OF SERVICE

Chambers v. Equifax, Inc., et al.

Case No.:

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On **September 15, 2017**, I served a true copy of:

NOTICE OF REMOVAL

☐ By personally delivering it to the persons(s) indicated below in the manner as provided in FRCivP5(B);

☒ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to:

Todd M. Friedman

Adrian R. Bacon

21550 Oxnard St., Suite 780

Woodland Hills, CA 91367

Tel: 877-206-4741

Email: tfriedman@toddfllaw.com

Email: abacon@toddfllaw.com

Attorneys for Plaintiff Ryan Chambers

☒ By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s/ Thomas P. Quinn, Jr.

THOMAS P. QUINN, JR.

Place of Mailing: Laguna Beach, California.

Executed on **September 15, 2017**, at Laguna Beach, California.

SERVICE LIST

Todd M. Friedman
Adrian R. Bacon
21550 Oxnard St., Suite 780
Woodland Hills, CA 91367
Tel: 877-206-4741
Email: tfriedman@toddflaw.com
Email: abacon@toddflaw.com
Attorneys for Plaintiff Ryan Chambers